

Comment No. (Ref)	Comment	Response
Colorado Department of Public Health & Environment (CDPHE) Comments		
	General Comments	
1	This section should contain a discussion of the accelerated actions that were performed to remove contamination, in addition to the discussion regarding the CRA that was performed after completion of the accelerated remedial activities. This should include the surface and subsurface accelerated action cleanup goals that drove remedial/removal actions, and the results of those actions. As currently provided this discussion is confusing in providing newly defined PRGs without inclusion of the former WRW cleanup levels that drove all actions to date, and the results of those actions. Also, utilizing samples that were collected or currently reside below the surface as surface samples may be conservative in performing the CRA, but they provide an inappropriate understanding of the final configuration of actual surface contamination remaining at the site. As such, appropriate figures showing the actual levels of surface contamination remaining at the site should also be provided.	<p>Section 1.0 provides a discussion of the accelerated actions performed at RFETS. The nature and extent of contamination sections present data after the accelerated actions were completed. It is not appropriate to include a discussion of the accelerated actions completed at RFETS or their associated cleanup goals in a discussion on the nature and extent of contamination.</p> <p>The PRGs that are used in this section are defined in Section 3.1.</p> <p>The Nature and Extent of Soil Contamination represents the concentration of contaminants remaining in soil after accelerated actions were completed because this is what the data collected through the RFCA accelerated action process represent. The environmental medium classification for the samples used in this section is as documented during sample collection. No attempt has been made to alter the environmental medium classification based on final land configuration. The RI/FS does not represent the final configuration of the site and specifically does not consider the final recontouring of the site.</p>
2	Although historically "soil" contamination has been recognized as being determined through "soil" sample analysis, which is presented to support the CRA. However, now that the site has completed all remedial activities including building removal, this discussion should be expanded to also include all contamination remaining in the soil above remediation goals, either or both WRW or PRG. As such, soil contamination would also include the remaining buried subsurface building structures, NPWLs, OPWLs, etc. Also, please provide a figure that identifies the location of actual remaining contamination associated with IHSSs, PACs, UBCs, NPWLs, OPWLs, and buildings (B371,	<p>The nature and extent sections focus on contamination remaining in environmental media. Subsurface features, such as buried building structures, that remain and may be contaminated are not environmental media, but are presented as physical features. As such, they are discussed in Section 2.0, Physical Characteristics of the Study Area. Additional information has been provided in Section 2.3 to address the concern of contaminated subsurface features. Confirmation samples collected in soil beneath and around these structures are included in this section.</p>

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	374, 771, 774, 730, 447, etc.). This should include the rads, chemicals, metals, etc., but also other contamination such as asbestos (generally asbestos tiles, such as at B991, or underground lines).	
	Specific Comments	
1	Section 3-Perhaps there should be a discussion of the sampling methodology adopted by the RFCA parties that also addresses the potential existence of unknown hot spots.	Per agreement with the RFCA parties, no change needs to be made to Section 3.0.
2	Section 3.1 (page 3-1) - The clarity suggested in the general comment should also be applied to the 2 nd paragraph in this section.	Please see response to CDPHE general comment 1.
3	Section 3.2 (Page 3-2)- The title of Figure 3.1 referenced in the 1 st paragraph, should reflect the full description given here.	The title of Figure 3.1 has been modified to read "Location of Select Historical IHSSs, PACs and UBC Sites."
4	Section 3.2, Figure 3.1-It should be noted that this figure does not show all of the IHSSs, PACs, or UBCs that did or potentially impacted soil. Either change the text and/or appropriately modify the figure to properly identify all of these sites. Also, considering that the IA OU is now considered the DOE retained lands, this changes the extent of the IA OU, and changes the BZ OU as well (as discussed in the ES), which should be recognized in this discussion.	<p>The text has been clarified and states "These locations were selected to provide reviewers with a point of reference in the nature and extent of soil contamination text. The locations are not an all inclusive list of historical IHSSs, PACs, or UBC sites that may have historically contained soil contamination."</p> <p>The IA OU boundary presented in Section 3.0 is the boundary identified in RFCA. The rationale to modify the OU boundaries is presented in Section 9.0 of this report and is based on results of the RI. The final decision to modify the OU boundaries will be made in the final CAD/ROD after comments on the Proposed Plan have been received.</p>
5	Section 3.2, 1 st paragraph, last sentence- Please remove the last sentence or modify it to make a proper statement, as it currently does not appear to make sense, in that all contamination would not be evident in surface soils.	The last sentence in Section 3.2, 1 st paragraph will be deleted.
6	Section 3.2, 4 th paragraph- This discussion should be expanded to recognize that not all buildings were removed and that some remain. Also, the discussion should include the PDS as well as	<p>Section 3.2, 3rd paragraph, 1st sentence, footnote added:</p> <p>"By October 2005, all buildings were removed except for the</p>

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	the RLCs that were performed to characterize the buildings for final disposition.	<p>east and west vehicle inspection sheds, and some subsurface features such as building foundations and slabs. See Section 2.3 for details.”</p> <p>Section 3.2, 3rd paragraph, the 3rd sentence is modified as follows:</p> <p>“If hazardous substances were present at levels that required building removal by means of a RFCA decision document, the disposition process required additional appropriate characterization, including a pre-demolition survey, and monitoring activities during the removal.”</p>
7	Section 3.2, page 3-4, 1 st paragraph - Please expand this to recognize that the two landfills are only two of the many remaining subsurface sources of contamination.	<p>Section 3.2, 7th paragraph is modified as follows:</p> <p>“Sources of subsurface contamination that remain after accelerated actions include two landfills with closure covers: the Present Landfill and the Original Landfill. Any other site related contamination that remains after accelerated actions, in addition to the Present Landfill and Original Landfill, will be identified through the RI process and evaluated in the FS. The RI process will identify potential sources that could impact both human health and the environment. While this section defines the extent of contamination by focusing on detection limits, site-specific background concentrations, and human health PRGs, the CRA includes an extensive analysis of potential impacts to the environment. See Appendix A, Volumes 2 through 15A.”</p>
8	Section 3.2 (page 3-4) - The sentence at the top of the page seems to imply that the only subsurface contamination is at the 2 landfills.	Please see response to CDPHE specific comment 7.
9	Section 3.4.1, 2 nd paragraph (page 3-7) - It might be useful to explain how the results differ by using the two different background comparison methods described in this paragraph.	The method used is consistent with CDPHE guidance and CERCLA requirements. The reference to the CRA method has been deleted since it is not relevant to this discussion.

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10	Page 3-7, section 3.4.2, first paragraph -This paragraph illustrates the need for use restrictions that mirror the exposure assumptions used in the CRA Methodology. Also, the last sentence in the first paragraph is unclear. Does this mean that no exposures below 8 feet were considered? If so, that highlights the need for another use restriction.	<p>The first paragraph of Section 3.5.2 (former Section 3.4.2) will be deleted. The comparison of subsurface soil data to the WRW PRGs is completed regardless of soil depth. The following sentences will be added to the text:</p> <p>“Surface soil data were compared to surface soil WRW PRGs. Subsurface soil data, regardless of depth, were compared to subsurface soil WRW PRGs.”</p> <p>Use restrictions are not identified in this section; however, they will need to be incorporated in the FS.</p>
11	Page 3-8, Section 3.4.3, 2 nd paragraph - How does the elimination of AOIs w/ a detection frequency < 1 % square with the CDPHE SWMU-based approach to risk evaluation?	Per agreement with the RFCA parties, analytes that are present with a frequency of detection < 1 % above the WRW PRG or applicable standard was eliminated as an AOI unless process knowledge suggests it be retained.
12	Section 3.4.4. - As per comment #1, this section should be expanded to recognize that accelerated remedial actions have occurred to remove some of these contaminants, even if they may not be included in the list of AOIs for the CRA. Also, it is not evident how process knowledge could be used to remove at least some of these AOIs. Free mercury was found and removed under B441, antimony was also a concern at the east firing range, etc, etc.	<p>Please see response to CDPHE general comment 1 regarding accelerated actions.</p> <p>As identified in the last paragraph of Section 3.5.3, Table 3.11 (former Table 3.4) provides the basis for eliminating certain analytes as a soil AOI based on process knowledge such as isolated analyte concentrations or the occurrence of a ubiquitous, naturally occurring soil constituent. Specifically in surface soil, as stated in Section 3.5.4, 1st paragraph, last sentence, only two analytes were eliminated based on process knowledge, cobalt and mercury. Section 3.5.3 identifies other analytes that were eliminated in surface soil based on a frequency of detection (greater than the WRW PRG) of less than 1 percent.</p> <p>Mercury was eliminated as an AOI in surface soil based on the frequency of detection (greater than the WRW PRG) being less than 1 percent and based on the knowledge that mercury was not used in the manufacturing or production processes at RFETS.</p>

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		<p>Instead mercury was found in instruments and gauges. During accelerated actions mercury was found within a specific section of B441's process waste line and mercury was found in the subfloor piping beneath B443 (not beneath B441) and was not found outside the pipe. Mercury was not identified as a contaminant for any UBC building. Based on accelerated actions and process knowledge, mercury would not be considered an AOI for surface soil. Table 3.11 (old Table 3.4) will be updated to add the information regarding the B441 process waste lines.</p> <p>Antimony was eliminated as an AOI in surface soil based on the frequency of detection (greater than the WRW PRG) being less than 1 percent. As stated in Table 3.11 (old Table 3.4), only two isolated sampling locations had concentrations greater than the WRW PRG and were located in two separate locations (out of 2,482 samples). The antimony concentration (433 mg/kg) found at the east firing range berm area (CW37-012) (associated with shell casings) exceeded the WRW action level of 409 mg/kg in surface soil was removed through an accelerated action (Closeout report for IHSS Group 900-11, East Firing Range and Target Area).</p>
13	Section 3.4.4, page 3-9, last paragraph, Table 3.5 - Please modify the text to properly describe what is meant by the discussion of the green rows being retained as AOIs when the previous discussion stated that at least some of these were removed as AOIs.	<p>Section 3.5.4, last paragraph, 3rd sentence has been modified as follows:</p> <p>"Green highlighted rows indicate those AOIs with a frequency of detection greater than 0 percent and less than 1 percent above the WRW PRG and, based on process knowledge or the contiguous location of the samples, were retained as AOIs."</p>
14	Section 3.4.5 - Please modify this discussion to include the remaining contamination in the soil associated with building structures and other infrastructure not specifically identified through soil samples.	Please see response to CDPHE general comment 2.

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15	Section 3.5.1 - Historical activities also released other contaminants such as mercury, arsenic, etc.	Section 3.6.1, 1 st paragraph, 4 th sentence, last portion- "... metals such as cadmium, chromium, and lead" was not meant to be an all inclusive statement for the metals that may have been disposed or released into the environment. The metals that are listed are the more common analytes detected during historical site investigations.
16	Section 3.5.2 - Since a discussion regarding the remedial actions that were performed to remove metals contaminants (aluminum, arsenic, chromium, vanadium) are included, please include such discussions for all of the AOIs discussed. Also, please include discussion of the probable source of the other AOIs as is included for the metals.	Per discussion with the RFCA Parties the following sentence has been added to Section 3.6.1, 2 nd paragraph "For clarification, historical use information is provided for naturally occurring metals."
17	Section 3.5.2, page 3-15, SVOCs - Please provide some further discussion/clarification or appropriately modify the discussion regarding the significance of the statement that the majority of the samples did not detect these compounds.	Section 3.6.2, SVOCs, Benzo(a)pyrene, 4 th sentence modified as follows: "As shown in Figure 3.13, benzo(a)pyrene was not detected in a majority of the sample results within the BZ OU."
18	Section 3.5.2, page 3-15, Am & Pu - It is unclear why the discussion of the B776 contamination is specifically provided as opposed to other such sites, such as B774, 374, 903 Pad, etc. Please modify this discussion to discuss all of the remaining contamination that is of similar final condition.	Building 776 is the only area discussed since the maximum concentrations of both americium and plutonium (as identified in Table 3.6) are at this location. The 3 rd sentence in Section 3.6.2, Americium-241, will be clarified as follows: "As identified in Table 3.13 (former Table 3.6), the maximum americium-241 activity of 51.2 pCi/g, and is located near the southwest corner of former Building 776 (sample location CE45-128). This confirmation sample was collected from the floor of an excavation area approximately 5 feet below grade and was designated as a surface soil sample. Although the sample was not at the surface after imported clean backfill had been placed in the excavation, the sample was still classified as a surface soil sample in the database (DOE 2005c)." The 3 rd sentence in Section 3.6.2, Plutonium-239/240 has been

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		<p>clarified as follows:</p> <p>“As identified in Table 3.13 (former Table 3.6), the maximum plutonium-239/240 activity of 183 pCi/g and is located near the southeast corner of former Building 776 (sample locations CE45-128 and CE45-134). These confirmation samples were collected from the floor of an excavation area approximately 5 feet below grade and were designated as surface soil samples. Although the samples are not at the surface after imported clean backfill has been placed in the excavation, the samples are still classified as surface soil samples in the database (DOE 2005c).”</p>
19	Section 3.5.3 - Please include a discussion of the remaining subsurface contamination as discussed above associated with remaining buildings, infrastructure, etc. This should also be included in each of the individual subsections as appropriate.	Please see response to CDPHE general comment 2.
20	Table 3.4 - Since this table discusses concentration above the PRG, it is suggested that the table(s) of PRGs be provided prior to this table. Although Barium is not discussed in this table, barium (at 44,500) above accelerated action soil action levels was found under asphalt immediately east of B881, which should be included in this discussion in Table 3.4 and/or included in Table 3.7, unless it is determined to be an NLR sample. The discussion regarding mercury incorrectly identifies B443, when it actually was found associated with the former lab B441.	<p>A footnote has been added to Table 3.11 (former Table 3.4) stating: “WRW PRG values for surface soil are provided in Table 3.12 (former Table 3.5), and WRW PRGs for subsurface soil are provided in Tables 3.14 (former Table 3.7) through 3.23 (former Table 3.16).”</p> <p>The barium concentration of 44,500 mg/kg was detected at location CG34-016 using x-ray fluorescence (XRF). As stated in Section 3.3.1, specific criteria for data processing were developed to support RI requirements and DQOs (Appendix A, Volume 2, Attachment 2). Data analyzed by screening methods such as XRF were not included in the final data set.</p> <p>Barium is not identified in Table 3.11 (former Table 3.4), since it was not eliminated as an AOI based on process knowledge. Based on the data set used, barium was not detected in soil (at any depth) above the WRW PRG.</p>

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		Please see response to CDPHE specific comment 12 for mercury and other updates to Table 3.11 (former Table 3.4).
21	Table 3.5 & 3.6 - As discussed above, this table appears to provide an inaccurate record of actual contamination remaining in surface soil. One of the most obvious concerns is identified with remaining Pu above 50 pCi/g (table shows 183 pCi/g), which was supposed to have been removed by accelerated actions. In addition, all contamination over 3 times the WRW levels was supposed to have also been removed. As such, for purposes of the CRA the tables provided may be appropriate, but there needs to be some realism provided to account for the actual levels of contamination remaining for various intervals identified (all tables 3.5 – 3.17) after all areas have been filled and surface re-configuration completed.	Please see the response to CDPHE general comment 1 and CDPHE specific comment 18. Note: former Table 3.5 is new Table 3.12 and former Table 3.6 is new Table 3.13.
22	Table 3.7 – As discussed above, please correct this table to properly reflect the maximum Barium concentration to be 44,500 and as otherwise necessary.	Please see response to CDPHE specific comment 20. Note: former Table 3.7 is new Table 3.14.
23	Figure 3.1 – Please modify this figure as discussed above to properly identify all areas of concern with remaining contamination, or provide another figure that provides the appropriate information as discussed in the text above comments.	Please see response to CDPHE general comment 2 and specific comment 3.
24	Figure 3.1 - The Central Avenue Ditch label is mis-located.	Figure 3.1, the Central Avenue Ditch label has been properly located.
25	Figures 3.6-3.34 – As discussed above, these figures may be appropriate for the CRA but do not appear to provide appropriate information in relation to the accelerated action WRW levels, and therefore provide an inaccurate picture of the levels of remaining contamination for each analyte and depth shown. As such, appropriate information needs to be provided that properly identifies the levels of contamination actually remaining. Also, as previously discussed there appears to be missing information not included in these figures or the CRA. This missing information is apparent as previously discussed and as seen in	Please see response to CDPHE general comment 1. The closeout report for 700-7 (Building 779 area) indicates confirmation samples (CI45-000 and CI45-021) were collected at a depth of 5.0 to 5.3 feet and had concentrations of PCB-1260 at 9800 µg/kg. These data are not included in Tables 3.12 (former Table 3.5) and 3.13 (former Table 3.6), and Figure 3.11 since these samples are not surface soil data, but are confirmation subsurface soil data.

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	missing PCB 1260 data. In the B779 area (IHSS Group 700-7) residual PCB contamination from 5 to 5.3 feet, after removal of higher contaminated soil, is identified at levels up to 9800 µg/kg, yet this does not appear to be included in the surface contamination as shown in Table 3.5 or 3.6, but may be identified in Table 3.9. However, this interval is not included in the figures provided, neither 3.11 nor 3.28. As such since this data is derived from confirmation samples collected at the bottom of the excavation, it appears that it should have been identified and utilized as surface information as discussed in the text. Therefore, please provide and utilize correct consistent information and figures.	These data are included in Tables 3.16 (former Table 3.9) and 3.17 (former Table 3.10) for the depth interval of >3.0 feet and < 8.0 feet. For subsurface soil, the WRW PRG is 15,514 µg/kg and the subsurface soil data (around former Building 779) are all below the WRW PRG. Because there were no PCB-1260 data greater than the WRW PRG no figure is provided in this section. These data do not appear for that area (former Building 779) on Figure 3.28 since this figure represents the depth intervals of >12 feet and < 30 feet, >30 feet and < 50 feet, and >50 feet.
	Editorial Comments	
1	No need for parentheses in the 3 rd sentence in Section 3.4	The parentheses in the 3 rd sentence in Section 3.5 will be removed.
2	Add, "of that report" to the end of the second to last sentence of the first paragraph in Section 3.4.1	The phrase "of that report" will not be included to references within the RI/FS Report. References to documents outside of the RI/FS Report will be clearly identified.
3	Lower case "u" in "uranium" at the end of the 2 nd paragraph of Sec. 3.4.3; lower case "f" in "figures" in the next paragraph.	Changes made.
4	Section 3.5.2.- delete "at the site and was used" from the 1 st sentence of the 2 nd paragraph under Arsenic (page 3-13).	Changes made.
5	Section 3.5.3.1 (page 3-18) and Section 3.2.3.2 (page 3-21), 1 st and 2 nd paragraph under "Summary of Subsurface..."-Change "were bound laterally by having concentrations" to "bounded laterally by concentrations..."	Changes made.
	Environmental Protection Agency (EPA) Comments	
	General Comments	
1	The description of nature and extent of contamination for soil, surface water, and groundwater should be provided based on presentation of data and summary statistics (background, means, etc.) as needed. Sections 3, 4 and 5 should be rewritten to	Please see additions to Sections 3.0 and 3.1 for an explanation of the nature and extent of soil contamination approach. Summary statistics for the RI-Ready data set are now presented in new Tables 3.1 through 3.7 in Section 3.3.1. A new discussion of the

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	present data, figures and maps as obtained from analytical results, without risk interpretation, analytes of interest (AOIs) screening, process knowledge, or comparison to the Wildlife Refuge Worker (WRW) preliminary remediation goals (PRGs). Data should be presented based on detection limits. Please note, thorough comment on the interpretation of data screening is not provided due to the extent to which this comment will affect the revision of the text.	summary statistics will be provided in Section 3.4.
2	The data quality objectives (DQOs) associated with the RI/FS are not presented. The accelerated actions were performed based on human health PRGs only, yet data were collected to serve multiple purposes (human health and ecological evaluation). The DQOs for the RI/FS determine whether existing data are adequate to evaluate human health and the environment. Please present RI/FS DQOs relevant to current site conditions and discuss how DQOs are met.	Please see additions to Sections 3.0 and 3.1 for an explanation of the nature and extent of soil contamination approach. A DQO discussion for the nature and extent of soil contamination will be provided as a new Section 3.3.2.
3	Section 1 presents an appropriate summary of potential contamination sources. However, the nature and extent sections do not adequately present the historical information to describe residual contamination. Please revise the nature and extent for each media in terms of how the data represent and characterize the historical sources. In general, there is relevant and significant information presented on figures that has not been interpreted and discussed in the text in sufficient detail. Please revise the text to reference and interpret key figures that are currently in text figures or on the CD.	Please see response to CDPHE general comment 1. In addition to the information provided in Section 1.0, the final Historical Release Report will be added to the RI/FS Report as Appendix B. Section 3.2 describes how the data represent and characterize historical sources as well as confirm that no additional sources of contamination exist within the Buffer Zone OU.
4	Presentation of interpretive findings, such as comparison to PRGs, should be provided in a separate chapter that would serve as a bridge between the extensive risk assessments presented in Appendix A and the RI/FS. This chapter should present a risk evaluation and a summary of both human health and ecological risks. Rather than presenting two executive summaries, one for the RI and one for the Comprehensive Risk Assessment (CRA),	Per agreement with the RFCA Parties, no change needs to be made to Section 3.0. Summary statistics are now presented in new Tables 3.1 through 3.7 in Section 3.3.1. A new discussion of the summary statistics will be provided in Section 3.4.

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	<p>the Executive Summary currently presented in the CRA should be eliminated. The information from the CRA Executive Summary should instead be presented in the CRA Summary following the Fate and Transport section of the RI.</p>	
5	<p>The data source subsections in Section 3.0 through 5.0 describe a process used for extracting and filtering data records from the Soil/Water Database (SWD). As indicated in the previous comment, risk assessment practices (e.g., use of one half the detection limit) should not be used for reporting nature and extent of contamination. The descriptions presented in the data source sections have not clearly defined the SWD or presented the process used for extracting and filtering data from SWD. It is requested that a general description of the SWD, general definitions (e.g., data records, versus data points, versus sampling locations), and a concise presentation of the data “filtering” process (as presented in the previous response to comments dated July 30, 2005) be provided in the discussion of the data used in the RI. The Data Source sections for each media should be revised to provide a concise description of the total amount of records included in SWD, records eliminated based on the “filtering” process, and records retained for use. The comprehensive data set that was used and data eliminated should be presented on a disk for the record.</p>	<p>Use of one half the reported detection limit value is consistent with EPA’s 2002 Guidance for Comparing Background and Chemical Concentrations in Soil for CERCLA Sites (EPA 540-R-01-003, OSWER 9258.7-41, September 2002). This reference has been added to Section 3.3.1, 6th paragraph.</p> <p>Section 3.3.1, has been modified to add language describing SWD, the process for extracting and filtering data from SWD and a definition for data record in relation to sampling location. No definition for data point is provided as this term was not used in the nature and extent evaluation sections.</p> <p>A summary of the data filtering process is provided in Section 3.3.1 Data Source, referencing Appendix A, Volume 2, Attachment 2 for the detailed list. This section also indicates that approximately 542,000 records were removed during this data filtering process.</p> <p>Data that did not meet data quality filters was included on CD-ROMs in the draft RI/FS Report, Appendix A, for each exposure unit.</p>
6	<p>For Sections 3.0 through 5.0, it is indicated that data adequacy and data quality are presented in Appendix A, Volume 2 Attachments 2 and 3. It is then indicated that a data quality assessment (DQA) is included in Attachment 2 to each section (which is presented on CD ROM). It is not clear why two different DQA sections are referenced for the same dataset.</p>	<p>Reference to the DQA included in former Attachment 2 to this section, has been omitted.</p> <p>One comprehensive RI-Ready data set is used as the starting point for all RI evaluations including the CRA.</p> <p>The DQA in Appendix A, Volume 2 has been modified based on</p>

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	<p>The RI should be revised to clarify and present one comprehensive RI data set used to document nature and extent of contamination and its associated DQA. Nature and Extent and Fate and Transport should be evaluated based on all data.</p> <p>The CRA should then be presented as a relevant sub-set of comprehensive RI dataset.</p> <p>The DQA discussion lacks sufficient detail. Please see the EPA's DQA comments below (page 6 through 9) on the Appendix A, Volume 2, Attachment 2. These comments are also relevant to the DQA on CD in the RI Attachment 2. Please include the DQA into the text of the Final RI/FS document.</p>	EPA comments.
7	<p>In Sections 3.0 through 6.0, Attachment 2 (attached CD), Data Quality Assessment, the text states, "The nature and extent of soils report for the Rocky Flats Environmental Technology Site (RFETS) has been prepared in accordance with the CRA Methodology." The statement is not clear since the CRA Methodology was designed based on the assumption that the nature and extent of IHSSs (or other sources) was conducted as part of source characterization. While it is accurate to state that CRA Methodology was developed jointly with the regulatory agencies using the consultative process, the RI/FS text should not confuse the objective for data adequacy for the CRA versus the objective of data adequacy for the RI/FS. The data adequacy objective for the CRA was to determine if data were adequate for performing the risk assessment, not whether the nature and extent of contamination was established for the site. Please clarify the statement for this and the other data quality assessments provided as attachments to the Nature and Extent sections.</p>	<p>Section 3.3.2.5 identifies the decision rules, for the nature and extent of soil contamination, that describe how the data are adequate and how the data are of adequate quality.</p> <p>Section 3.3.3, 1st paragraph has been rewritten and the 1st two sentences have been deleted.</p> <p>Section 3.3.3 concludes that all data are adequate to define the nature and extent of contamination remaining in soil. This nature and extent of contamination section demonstrates that the data are adequate to define the nature of contamination remaining in soil at the site and the extent of contamination in soil is bound.</p>
8	<p>In Sections 3.0 through 5.0, Attachments 1 and 2, the figures may need to be revised based on previous comments. EPA</p>	<p>An index is provided for the figures included on the CD/ROM. In addition, figure titles have been added.</p>

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	would like to schedule a meeting to discuss potential options for presenting data on figures. The attached disks will need an index and figures should be titled, to prevent having to review several hundred maps in order to find a particular map (e.g., to determine if carbon tetrachloride has been tested or detected in the LHSU). Please provide an index of figures and refer to appropriate figures in the text.	
	Specific Comments	
1	Page 3-4, Section 3.3.1, second sentence - This sentence states, "The data are further processed through a series of data quality filters to ensure usability that supports CRA requirements and DQOs." Please include a discussion of these data quality filters and exactly how the data are "processed". In addition, please describe how these data quality filters support the DQOs.	<p>Section 3.3.1, 3rd paragraph, 1st sentence will be modified as follows:</p> <p>"The data are further processed through a series of data quality filters to ensure usability that supports the nature and extent of contamination evaluations."</p> <p>A summary of the data quality filters, including how the data are processed, has been added to the 3rd paragraph of Section 3.3.1.</p> <p>Please see response to EPA general comment 7 regarding DQOs.</p>
2	Page 3-4, Section 3.3.1, first paragraph, last sentence; Page 4-1, Section 4.3.1, third sentence; and Page 5-4, Section 5.3.1, fourth sentence - The text states, "Only data deemed "CRA Ready = Yes" were used in this evaluation. Please described the definition of "CRA Ready = Yes", including a discussion on the processes and procedures used.	Section 3 has been modified to replace "CRA Ready = Yes" with "RI-Ready = Yes". A summary of the process used to identify RI-Ready Yes is in Section 3.3.1 and details are provided in Appendix A, Volume 2, Attachment 2.
3	Tables 3.5 through 3.16 - Some of the headers need explanation, possibly footnotes. Data qualifiers should be noted on each table, not in another document.	Footnotes have been added to clarify acronyms in the header for former Tables 3.5 (new Table 3.12) through 3.16 (new Table 3.23). A laboratory qualifier table (A2.3) is included in Attachment 2 to this section.
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	None	

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U.S. Fish and Wildlife Service's (USFWS) Comments		
	General Comments	
1	In the Nature and Extent sections, where possible, maps should incorporate "Kriging" maps instead of sample point maps. This will be easier for the public to understand. And it infers that there are contiguous levels, not just spots. This is most important in the soil and groundwater sections.	Per agreement with the RFCA parties, kriging is not required for Section 3.0.
2	When discussing VOCs in surface soil, surface water, and sediment, there should be a discussion of volatilization along with the statement that they are not AOIs in those media.	No VOC AOIs have been identified in surface soil.
	Specific Comments	
	None	
	Editorial Comments	
	None	